

Greg L. Lippetz (State Bar No. 154228)  
glippetz@jonesday.com  
Jacqueline K. S. Lee (State Bar No. 247705)  
jkslee@jonesday.com  
JONES DAY  
1755 Embarcadero Road  
Palo Alto, CA 94303  
Telephone: 650-739-3939  
Facsimile: 650-739-3900

Attorneys for Plaintiff and  
Counterclaim Defendant  
FREESCALE SEMICONDUCTOR, INC.

RONALD S. LEMIEUX (SB# 120822)  
rlemieux@cooley.com  
VIDYA R. BHAKAR (SB# 220210)  
vbhakar@cooley.com  
CARRIE J. RICHEY (SB# 270825)  
crichey@cooley.com  
COOLEY LLP  
3000 El Camino Real  
Five Palo Alto Square  
Palo Alto, CA 94306-2155  
Telephone: (650) 843-5000  
Facsimile: (650) 849-7400

Attorneys for Defendant and  
Counterclaim-Plaintiff  
CHIPMOS TECHNOLOGIES, INC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

Freescale Semiconductor, Inc.,  
  
Plaintiff,  
  
v.  
  
ChipMOS Technologies, Inc.,  
  
Defendant.

Case No. C-09-03689-PSG

**STIPULATED REQUEST AND  
~~PROPOSED~~ ORDER TO RESCHEDULE  
SETTLEMENT CONFERENCE**

Date: June 20, 2013  
Time: ~~1:00 p.m.~~ 9:30 a.m.  
Courtroom: A, 15th Floor  
Judge: Hon. Nathanael M. Cousins

Plaintiff Freescale Semiconductor, Inc. ("Freescale") and Defendant ChipMOS Technologies, Inc. ("ChipMOS," and together with Freescale, the "Parties") jointly submit this stipulated request to reschedule the Settlement Conference, currently set for May 23, 2013 at 9:30 a.m.

WHEREAS on April 15, 2013, Judge Davila issued an order that the parties participate in a Settlement Conference before Magistrate Judge Cousins to occur no later than June 28, 2013.

WHEREAS immediately following the issuance of Judge Davila's order, the parties met and conferred to determine when the decisionmakers from their clients would be available for days on which Magistrate Cousins held settlement conferences.

1 WHEREAS on April 22, 2013, prior to the parties completing their meet and confer  
 2 regarding dates of availability of necessary party representatives, this Court issued an order  
 3 setting a settlement conference for May 23, 2013.

4 WHEREAS the Freescale representative who has decisionmaking authority regarding  
 5 settlement of this matter was not and is not available on May 23, as he has an existing business  
 6 trip out of the country during that time.

7 WHEREAS on April 25, 2013, the parties requested that the settlement conference be  
 8 rescheduled to June 13, 2013, which request was denied on April 30, 2013.

9 WHEREAS the parties have continued to meet and confer to determine all dates between  
 10 now and June 28 on which the necessary party representatives are available on days on which the  
 11 Court holds settlement conferences.

12 WHEREAS, based on the Court and the parties' availability, the only date on which it  
 13 appears that the parties and the Court are available between now and June 28 is June 20, 2013.

14 THEREFORE, the parties request either:

15 1) The Court reschedule the settlement conference in this matter to June 20, 2013,

16 OR

17 2) The Court extend the deadline for completion of the settlement conference until a  
 18 date after June 28, and provide the parties with dates of availability for the  
 19 conference. The parties will then, within one week, confirm the availability of  
 20 their necessary representatives for one of the proposed dates.

21 **IT IS SO STIPULATED.**

22 Dated: May 10, 2013

JONES DAY

24 By: /s/ Greg L. Lippetz  
 25 Greg L. Lippetz

26 Counsel for Plaintiff and Counterclaim  
 27 Defendant  
 28 FREESCALE SEMICONDUCTOR, INC.

In accordance with General Order No. 45, Section X(B), the above signatory attests that

Concurrence in the filing of this document has been obtained from the signatory below.

Dated: May 10, 2013

COOLEY LLP

By: /s/ Ronald S. Lemieux

Ronald S. Lemieux

Counsel for Defendant and Counterclaim  
Plaintiff  
CHIPMOS TECHNOLOGIES, INC.

**IT IS SO ORDERED.**

Settlement Conference is continued June 20, 2013 at 9:30 a.m. Parties shall submit their Confidential Settlement Conference Statements no later than June 13, 2013.

DATED: May 17, 2013

By: \_\_\_\_\_

Hon. Nathanael M. Cousins

